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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91179480
Party	Defendant Kobelco Construction Machinery Co., Ltd.
Correspondence Address	Bassam Ibrahim Buchanan Ingersoll & Rooney PC 1737 King Street, Suite 500 Alexandria, VA 22314-2727 UNITED STATES bassam.ibrahim@bipc.com
Submission	Motion to Extend
Filer's Name	Bassam N. Ibrahim
Filer's e-mail	bassam.ibrahim@bipc.com
Signature	/bni/
Date	10/07/2008
Attachments	1033715-000025 - Motion.pdf ( 2 pages )(70190 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

PLASTI-FAB LTD.,	:	
Opposer,	:	
	:	
v.	:	Consolidated
	:	Opposition No. 91179480
KOBELCO CONSTRUCTION MACHINERY	:	Opposition No. 91179482
LTD.,	:	
Applicant.	:	

**MOTION FOR 30 DAY EXTENSION OF TIME TO RESPOND TO DISCOVERY  
WITHOUT CONSENT**

Applicant, Kobelco Construction Machinery Ltd. ("Kobelco") respectfully requests a 30 day extension to respond to Petitioner's Interrogatories and Document Requests. Applicant's responses are currently due October 7, 2008. Applicant requests a 30 day extension of this due date until **November 6, 2008**.

Applicant has made no previous extension requests and this Motion is being made in good faith to allow counsel time to gather the requested information to fully respond to the discovery requests. Thus, Applicant's request should be granted by the Board. See TBMP §403.04. In the event that the Board denies Applicant's Motion, Applicant requests that the board set a due date giving Applicant a reasonable time thereafter to prepare its responses.

Respectfully submitted,

KOBELCO CONSTRUCTION  
MACHINERY LTD.

By 

Bassam N. Ibrahim  
Bryce J. Maynard  
Attorneys for Applicant

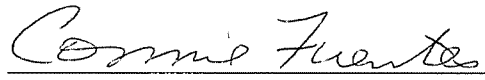
Date: October 7, 2008

BUCHANAN INGERSOLL & ROONEY PC  
1737 King Street  
Alexandria, VA 22314-2727  
Telephone: 703/836-6620  
Facsimile: 703/836-2021

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing MOTION FOR 30 DAY EXTENSION OF TIME TO RESPOND TO DISCOVERY WITHOUT CONSENT was served this 7th day of October, 2008, by first-class mail, postage prepaid, on:

David E. Sipiora  
Townsend and Townsend and Crew LLP  
1200 17th Street, Suite 2700  
Denver, CO 80202

  
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Connie Fuentes